



City of Tacoma
Media & Communications Office

August 7, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

City of Tacoma, Washington submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

City of Tacoma, Washington has two Government Access Television channels (TV Tacoma and CityPost) and a Regional Master Control Center which also serves Educational Access channels from the Tacoma Public Schools, Bates Technical College and the University of Washington, in addition to the Government Access channels from Pierce County and Tacoma Fire Department. We produce a variety of programs to inform and educate the residents of Tacoma and Pierce County about what is happening within our community and the opportunities available to them. These programs include: CityScape (monthly), Inside Tacoma (bi-monthly), Business Matters (monthly), CityLine (weekly) in addition to all City Council Study Sessions and City Council meetings (weekly). All of our programming is provided on our cable channels through Comcast and a local municipal cable TV company Click!, and is also available on the Web live (TV Tacoma) and is on video on demand. Our programming is available to approximately 140,000 subscribers in the City of Tacoma and another approximately 50,000 in Pierce County. We produce a total of approximately 18 hours per month of new original programming which does not include the special events that we cover in the community over the course of a year (Dr. Martin Luther King Junior Celebration, Economic Forecast, Boys and Girls Club Scholarship Event, Relay for Life, City of Destiny Awards, etc.).

We carry 12 different programs on our TV Tacoma Government Access channel of which two programs are closed captioned. We carry the programs "City Council Study Sessions" & "City Council Meetings", which include closed captioning on our channel. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Comcast and Click! Networks, do not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions readily available for our programs but we do not have accessibility options such as closed captioning information listed. However, currently, Comcast and Click! Networks have not been notified that we offer this, so we will communicate with them on this issue. This level of information currently is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information to include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

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